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**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

In re Effexor XR Antitrust Litigation

Master Docket No.

This Document Relates To:
All Actions

3:11-cv-05479 (ZNQ/JBD)

**CERTIFICATION OF KEVIN M. NEYLAN, JR. IN SUPPORT OF TEVA'S
OPPOSITION TO DIRECT PURCHASER CLASS PLAINTIFFS' MOTION FOR
CLASS CERTIFICATION**

I, Kevin M. Neylan, hereby certify and state as follows:

1. I am an attorney at law in the State of New York and admitted to appear *pro hac vice* in this matter. I am a partner of the firm of Kirkland & Ellis LLP, attorneys for Defendants Teva Pharmaceutical Industries Ltd. and Teva Pharmaceuticals USA, Inc. ("Teva") in the above-captioned matter. I submit this certification in support of Teva's Opposition to Direct Purchaser Class Plaintiffs' Motion for Class Certification.

2. Attached hereto as Exhibit 1 is a true and correct copy of the Expert Report of J. Leitzinger, dated May 15, 2025 (filed under seal).

3. Attached hereto as Exhibit 2 is a true and correct copy of the Expert Report of Bruce Stangle, dated July 17, 2025 (filed under seal).

4. Attached hereto as Exhibit 3 is a true and correct copy of the Expert Report of Steven Galson, dated July 17, 2025 (filed under seal).

5. Attached hereto as Exhibit 4 is a true and correct copy of the U.S. Licensing Agreement between Wyeth and Teva, dated November 2, 2005, bearing the bates number WYEFFAT2299808 (filed under seal).

6. Attached hereto as Exhibit 5 is a true and correct copy of U.S. Patent No. 4,535,186, dated August 13, 1985.

7. Attached hereto as Exhibit 6 is a true and correct copy of U.S. Patent No. 6,274,171, dated August 14, 2001.

8. Attached hereto as Exhibit 7 is a true and correct copy of U.S. Patent No. 6,419,958, dated July 16, 2002.

9. Attached hereto as Exhibit 8 is a true and correct copy of U.S. Patent No. 6,403,120, dated June 11, 2002.

10. Attached hereto as Exhibit 9 is a true and correct copy of a webpage titled *Fortune 500 – The Largest Companies in the U.S. by Revenue* (2025), available at <https://fortune.com/ranking/global500/>.

11. Attached hereto as Exhibit 10 is a true and correct copy of a press release titled *Arnold Delhaize Reports 2024 Financial Results and Introduces Outlook for 2025 with Projected Growth in Sales and Earnings in Line with its Growing Together Strategic Ambitions*, available at

<https://newsroom.aholddelhaize.com/ahold-delhaize-reports-q4-2024-financial-results-and-introduces-outlook-for-2025-with-projected-growth-in-sales-and-earnings-in-line-with-its-growing-together-strategic-ambitions/>.

12. Attached hereto as Exhibit 11 is a true and correct copy of a webpage titled *Schnuck Markets | Company Overview & News*, available at <https://www.forbes.com/companies/schnuck-markets/>.

13. Attached hereto as Exhibit 12 is a true and correct copy of a webpage titled *Wakefern Food Corp. Hosts 2024 Annual Meeting*, available at <https://newsroom.wakefern.com/2024/10/wakefern-food-corp-hosts-2024-annual-meeting/>.

I hereby certify, under penalty of perjury, that the foregoing statements made by me are true.

Dated: July 24, 2025



Kevin M. Neylan, Jr.